

1 Robert A. Mittelstaedt (State Bar No. 60359)
2 ramittelstaedt@jonesday.com
3 Craig A. Waldman (State Bar No. 229943)
4 cwaldman@jonesday.com
5 David C. Kiernan (State Bar No. 215335)
6 dkiernan@jonesday.com
7 Lin W. Kahn (State Bar No. 261387)
8 linkahn@jonesday.com
9 JONES DAY
10 555 California Street, 26th Floor
11 San Francisco, CA 94104
12 Telephone: (415) 626-3939
13 Facsimile: (415) 875-5700
14
15 Attorneys for Defendant
16 Adobe Systems Inc.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

13 IN RE: HIGH-TECH EMPLOYEE
14 ANTITRUST LITIGATION

15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**EXHIBIT 6 TO DECLARATION OF
CHRISTINA BROWN IN SUPPORT
OF DEFENDANTS' OPPOSITION TO
PLAINTIFFS' SUPPLEMENTAL
MOTION FOR CLASS
CERTIFICATION**

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

5 IN RE: HIGH-TECH EMPLOYEE)

6 ANTITRUST LITIGATION) NO. 11-CV-2509-LHK

10 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

13 VIDEOTAPED DEPOSITION OF SIDDHARTH HARIHARAN

14 San Francisco, California

15 Friday, October 12, 2012

16 Volume I

20 Reported by:

21 ASHLEY SOEVYN

22 CSR No. 12019

23 Job No. 1541277

25 PAGES 1 - 310

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1	A. Nope.	11:32:11
2	Q. You were reasonably content with the	11:32:13
3	prospect of getting a 17,000-plus raise?	11:32:15
4	A. Correct.	11:32:18
5	Q. It didn't bother you that your friend who	11:32:19
6	was slightly more experienced was making \$12,000	11:32:24
7	more than you?	11:32:27
8	A. Well, I -- I don't recall. I wouldn't say	11:32:31
9	necessarily, but he was a little bit more	11:32:37
10	experienced than me at the time. I don't think I --	11:32:40
11	I can't remember if I -- I thought about it much.	11:32:44
12	I'm not sure.	11:32:45
13	Q. Did you ever use the \$72,000 figure that he	11:32:47
14	had given to you as a basis for renegotiating your	11:32:50
15	compensation with EA?	11:33:00
16	A. No.	11:33:01
17	Q. After you joined EA, did you have	11:33:01
18	discussions with any co-workers about relative	11:33:04
19	salaries that people were making?	11:33:10
20	A. Yes.	11:33:12
21	Q. Did that happen often?	11:33:13
22	A. No.	11:33:14
23	Q. Just occasionally?	11:33:15
24	A. Yes.	11:33:16
25	Q. On roughly how many occasions do you recall	11:33:18

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1	during your time at EA, where you had discussions	11:33:21
2	with your co-workers about relative salaries?	11:33:25
3	A. I wouldn't be able to say.	11:33:33
4	Q. More than a dozen?	11:33:35
5	A. Maybe. Maybe just under a dozen, maybe a	11:33:40
6	little bit more.	11:33:44
7	Q. What was the overall impression that you	11:33:45
8	got from these discussions about salaries with	11:33:47
9	co-workers? Did you feel you were being paid	11:33:49
10	fairly, based on what you heard from your peers?	11:33:54
11	A. You see, I wasn't too focused on my salary	11:34:07
12	while I was working at EA necessarily, but I was	11:34:11
13	just focused on doing my job. I cared about my	11:34:14
14	work. I was head down in my work. As long as the	11:34:22
15	system wasn't taking advantage of me, which I didn't	11:34:25
16	feel at the time they were, I was okay with what I	11:34:28
17	was getting paid.	11:34:31
18	Q. Did you ever use any of the information	11:34:35
19	that you got from your co-workers about salary while	11:34:38
20	you were at EA as the basis for going to your leader	11:34:42
21	and your manager and asking for more money?	11:34:47
22	A. During my time at EA, I never asked for	11:34:50
23	more money.	11:34:54
24	Q. Did you ever feel that you ought to be	11:34:58
25	getting paid more money?	11:34:59

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1	A. Sure, there were times where I could have	11:35:03
2	used more. But like I said -- said earlier, I was	11:35:05
3	focused on my work. And as long as I felt that the	11:35:12
4	company was not doing anything shady, I was okay	11:35:16
5	with what I was getting paid because I was getting,	11:35:25
6	you know, knowledge as well.	11:35:29
7	Q. After you -- you started at EA at a \$60,000	11:35:31
8	a year salary, did your salary ever increase during	11:35:34
9	your time at EA?	11:35:38
10	A. Yes, it increased automatically after my	11:35:40
11	first performance review where just suddenly my	11:35:45
12	paycheck happened to be a little bit higher. I	11:35:49
13	think it was 61-.	11:35:52
14	Q. Was that -- you said "automatically." That	11:35:55
15	was EA practice if somebody passed their first	11:35:59
16	performance review, they would get a slight salary	11:36:02
17	bump?	11:36:05
18	A. I don't know if it was EA practice. I just	11:36:06
19	know that I looked at my paycheck and it was a	11:36:09
20	little higher.	11:36:13
21	Q. Fair enough. After that initial slight	11:36:13
22	increase in your paycheck at EA, did you have any	11:36:16
23	other subsequent salary increases while you were at	11:36:19
24	EA?	11:36:26
25	A. No, I didn't have any subsequent salary	11:36:27

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1 I declare under penalty of perjury under the
2 laws of the State of California that the foregoing
3 is true and correct.

4

5 Executed on _____, 2012,
6 at _____.

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11 _____

12 SIDDHARTH HARHARIHAN

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1 STATE OF CALIFORNIA) ss:

2 COUNTY OF MARIN)

3
4 I, ASHLEY SOEVYN, CSR No. 12019, do hereby
5 certify:

6 That the foregoing deposition testimony was
7 taken before me at the time and place therein set
8 forth and at which time the witness was administered
9 the oath;

10 That the testimony of the witness and all
11 objections made by counsel at the time of the
12 examination were recorded stenographically by me,
13 and were thereafter transcribed under my direction
14 and supervision, and that the foregoing pages
15 contain a full, true and accurate record of all
16 proceedings and testimony to the best of my skill
17 and ability.

18 I further certify that I am neither counsel for
19 any party to said action, nor am I related to any
20 party to said action, nor am I in any way interested
21 in the outcome thereof.

22 IN THE WITNESS WHEREOF, I have transcribed my
23 name this 22nd day of October, 2012.
24

25 ASHLEY SOEVYN, CSR 12019